

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

May 11, 2004

SENT BY E-Mail, and  
First Class U.S. Mail

Thomas P. O'Neill, Esq.  
KeySpan Energy Delivery  
52 Second Avenue  
Waltham, MA 02451

Re: Colonial Gas Company, D.T.E. 04-18

Dear Mr. O'Neill:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Colonial Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 25, 2004.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Service List  
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUEST OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
COLONIAL GAS COMPANY

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Colonial Gas Company ("Colonial" or "Company") the following information request(s) with respect to the March 1, 2004 Service Quality ("SQ") Report, ("Filing") D.T.E. 04-18.

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

### **Requests**

- DTE 1-1 Please explain how the Company's Staffing Levels were computed. Of the 1,612 employees reported in 2003, please indicate how many of these employees were exclusively Colonial employees, or otherwise allocable to Colonial.
- DTE 1-2 Please provide the following information for the Company's Lost Accident Rate category:
- (a) the raw data underlying the measurements;
  - (b) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements, and;
  - (c) a complete and detailed description of the reasons the Company made each addition, reduction, correction, or any other adjustment made to the raw data and the assumptions used to determine the final measurements.
- DTE 1-3 Please provide the following information for the Company's Response to Odor Calls Percentage category:
- (a) the raw data underlying the measurements;
  - (b) the additions, reductions, corrections, or any other adjustments made to the raw data and the assumptions used to determine the final measurements, and;
  - (c) a complete and detailed description of the reasons the Company made each addition, reduction, correction, or any other adjustments made to the raw data and the assumptions used to determine the final measurements.

- DTE 1-4      Please provide all of the raw data and adjustments for each of the Company's service quality categories as well as calculations of the penalties/credits in an Excel spreadsheet format on a 3" diskette.
- DTE 1-5      Referring to the Company's capital spending forecast/actual, please break down the Company's replacement of mains for each year by material type.
- DTE 1-6      Referring to the Company's capital spending forecast/actual, please break down the Company's replacement of service lines for each year by material type.
- DTE 1-7      Please provide, itemize, and quantify the amounts of mains and services as of December 31, 2002 that still need to be replaced by the Company to meet its requirements under the Department's regulations in 220 C.M.R. 113.05.
- DTE 1-8      Please explain how the Company calculates the number of responses to Odor Calls. Specifically, if the Company receives more than one call regarding the same odor source, does the Company count this as one call or as multiple calls?